

NICHOLAS A. TRUTANICH
United States Attorney
Nevada Bar Number 13644
RICHARD ANTHONY LOPEZ
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: 702.388.6551 / Fax: 702.388.6418
tony.lopez@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAILI TUALAU,

Defendant.

Case No. 2:16-cr-294-JCM-VCF-3

**Stipulation to Extend Deadlines
Regarding Defendant Tualau's Motion
(Third Request) [ECF 259]**

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, and Richard E. Tanasi, Esq., counsel for Defendant Kaili Tualau, that (1) the Government's deadline to respond to Defendant's motion filed at ECF 259, currently set for November 16, 2020, be extended to November 18, 2020; and (2) Defendants' deadline to file any reply be extended to November 30, 2020.

This stipulation is entered into for the following reasons:

1. On October 14, 2020, Defendant Tualau filed a motion to release grand jury testimony (at ECF 259). Under Local Criminal Rule 12-1(a)(2), the Government's response to this motion was originally due on or before October 28, 2020.

2. On October 26, 2020, the parties submitted a stipulation, which the Court granted, extending the deadline to respond to both motions to November 13, 2020.

3. On November 13, 2020, the parties submitted a stipulation, which the Court granted, extending the deadline to respond to both motions to November 16, 2020.

4. The parties request a further, short extension of the briefing schedule for Defendant Tualau's motion so that the Government has adequate time to respond.

5. This is the third request for an extension of time regarding the briefing schedule on Defendant Tualau's motion.

6. Because trial is scheduled for February 8, 2021, the granting of this stipulation will not affect the trial date.

7. Denial of this request for an extension could result in a miscarriage of justice.

DATED this 16th day of November, 2020.

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Richard E. Tanasi, Esq.
RICHARD E. TANASI, ESQ.
Counsel for Defendant TUALAU

/s/ Richard Anthony Lopez
RICHARD ANTHONY LOPEZ
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:16-cr-294-JCM-VCF-3

Plaintiff,

v.

KAILI TUALAU,

Defendant.

[Proposed] Order Granting Stipulation to Extend Deadlines

Regarding Defendant Tualau's Motion

Based on the pending stipulation of the parties, and good cause appearing, the stipulation is hereby GRANTED.

IT IS HEREBY ORDERED that the deadline for the Government's response to Defendant Tualau's motion filed at ECF 259 be extended to November 18, 2020; and

IT IS FURTHER ORDERED that the deadline for any reply by Defendant Tualau be extended to November 30, 2020.

DATED this 17th day of November, 2020.



HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE